

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

JILL HINES, *et al.*

Plaintiffs,

v.

ALEX STAMOS, *et al.*

Defendants.

Case No. 3:23-cv-00571
Chief Judge Terry A. Doughty
Magistrate Judge Kayla D. McClusky

**PLAINTIFFS' PROPOSED WRITTEN JURISDICTIONAL DISCOVERY AND
PROPOSED SCHEDULE FOR JURISDICTIONAL DISCOVERY**

Pursuant to the Court's December 18, 2024 Memorandum Order (ECF No. 131), Plaintiffs Jill Hines and Jim Hoft respectfully submit the attached proposed written jurisdictional discovery and the following proposed schedule for jurisdictional discovery.

I. Proposed Written Jurisdictional Discovery

Pursuant to the Court's Order, Plaintiffs are submitting proposed written jurisdictional discovery for the Court's approval. Plaintiffs seek authorization to propound the following:

- Requests for Production of Documents to Defendants Alex Stamos, Renée DiResta, Leland Stanford Junior University ("Stanford"); The Atlantic Council; Graham Brookie; Graphika; Camille François; Kate Starbird; and the Aspen Institute. *See* Exhibits A, B, C, D, E, F, G, H, and I.
- Interrogatories to Defendants Alex Stamos; Renée DiResta; Stanford; The Atlantic Council; Graham Brookie; Graphika; Camille François; Kate Starbird; and the Aspen Institute. *See* Exhibits J, K, L, M, N, O, P, Q, and R.

- A third-party document subpoena to the University of Washington, which is believed to be the custodian most likely to possess comprehensive documents regarding the involvement of Defendant Starbird, whose allegedly unlawful conduct was performed in the course of her duties as an employee of the University of Washington. *See* Exhibit S.

All of the proposed written discovery focuses on two issues: (1) each Defendants' contacts with the State of Louisiana, which inform whether the Court may exercise personal jurisdiction over Defendants; and (2) whether Plaintiffs' harms (*i.e.*, their censorship on social media) is traceable to the conduct of each Defendant, which informs whether the Court possesses subject-matter jurisdiction over this dispute.

II. Proposed Schedule for Jurisdictional Discovery

Plaintiffs respectfully propose the following schedule to complete jurisdictional discovery and supplemental briefing based on that discovery:

Deadline to Respond to First Set of Written Jurisdictional Discovery: 30 days after written discovery is approved by the Court.

Deadline for Plaintiffs to File Any Discovery Motions Based on Responses to First Set of Written Discovery: 21 days after Plaintiffs have completed their productions in response to the First Set of Written Jurisdictional Discovery.

Deadline for Plaintiffs to Seek Leave from Court to Serve Additional Written Discovery or Take Depositions: 30 days after Plaintiffs have completed their productions in response to the First Set of Written Jurisdictional Discovery.

Deadline for Plaintiffs to File Opening Supplemental Brief Regarding Personal Jurisdiction and Standing: 45 days after Plaintiffs have completed their productions in response to the First Set of Written Jurisdictional Discovery, if Plaintiffs do not seek leave to conduct

additional jurisdictional discovery. If Plaintiffs seek leave to conduct additional jurisdictional discovery, then the deadline would be 30 days after the Court denies leave to conduct any additional discovery or 30 days after the completion of all additional discovery authorized by the Court, as applicable.

Deadline for Defendants to File Responsive Supplemental Brief Regarding Personal Jurisdiction and Standing: 21 days after the filing of Plaintiffs' Opening Supplemental Brief Regarding Personal Jurisdiction and Standing.

Deadline for Plaintiffs to File Reply Supplemental Brief Regarding Personal Jurisdiction and Standing: 14 days after the filing of Defendants' Responsive Supplemental Brief Regarding Personal Jurisdiction and Standing.

Dated: January 2, 2025

AMERICA FIRST LEGAL

/s/ Gene P. Hamilton

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on January 2, 2025, I caused a true and correct copy of the foregoing to be filed by the Court's electronic filing system, to be served by operation of the Court's electronic filing system on counsel for all parties who have entered in the case.

/s/ D. John Sauer